

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	09-CR-43-SPF
	)	
LINDSEY KENT SPRINGER and	)	
OSCAR STILLEY,	)	
	)	
Defendants.	)	

SPRINGER'S OBJECTION TO 404(b)

Lindsey Kent Springer ("Springer") files his objection to the Prosecution's 404(b). Springer objects that his purported promotion of abusive trusts is not relevant to the claims in the indictment nor is any such suggestion probative of motive, knowledge and intent, regarding Counts One through Six.

Springer requests the Prosecution be prohibited from presenting any direct or circumstantial evidence of any promotion of Springer with "trusts" and to require the Prosecution show how any such promotion would be relevant to "knowledge, motive and intent" as alleged in their 404(b).

The Grand Jury does not allege any conduct involving "trusts" and the tax consequence of a trust is not at issue between the parties. True, Springer received money from numerous trusts, as the evidence will show, but the Grand Jury did not allege Springer provided any services rendered for those Trusts he received money from.

Springer also objects to any information regarding Stilley's suspension in Arkansas being presented to the Jury in this case unless the Prosecution can show relevance to the charges of Counts One, Three and Four. They have not explained the connection and Springer knows of none.

#### CONCLUSION

Springer request this Court prohibit the Prosecution from uttering or stating or referencing the term "abusive" when referencing the term "trust" and that the Prosecution be prohibited from presenting any evidence purporting to affiliating Springer to any promotion of any trusts unless a proper foundation is laid showing how such information would help the fact finder determine "Knowledge, motive, and intent" regarding the claims in Counts One through Six. Springer also requests the Court prohibit the Prosecution from entering any evidence related to Stilley's suspension saga in Arkansas as such controversy has no relevance to Counts One, Three and Four.

Respectfully Submitted  
/s/ Lindsey K. Springer  
Lindsey K. Springer  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Lindsey Kent Springer's  
Objection to Prosecution's 404(b) was ecf'd on September 21, 2009 to:

Kenneth P. Snoke,  
Charles O'Reilly,  
Oscar Stilley

/s/ Lindsey K. Springer  
Signature